

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Stacey L. Schmader, Leticia O'Dell, Chad)
 Nicholson, Kai Huschke, Markie Miller,)
 Michelle Sanborn, Malinda Clatterbuck,)
 Crystal Jankowski,)

Plaintiffs,

V.

Thomas Alan Linzey, in his Individual and)
 Official Capacities; Tammy Belinsky, in her)
 Individual and Official Capacities; Fred)
 Walls, in his Individual and Official)
 Capacities; Edward Wells, in his Individual)
 and Official Capacities; Community)
 Environmental Legal Defense)
 Fund and the Center for Democratic and)
 Environmental Rights;)

Defendants.

Civil Action No. 1:20-cv-00067

(Wilson, J.)
(Mehalchick, M.J.)

UNOPPOSED MOTION TO SEAL DOCUMENTS

Plaintiffs hereby move the Court, pursuant to Federal Rule of Civil Procedure 5.2(d), for an Order sealing Exhibits A and C to Plaintiffs' Motion for Temporary Restraining Order (Dkt. Nos. 7-3, 7-5); Plaintiffs' Amended Complaint (Dkt. No. 30); and Exhibits A-Z to the Amended Complaint (Dkt. No. 30-1) pursuant to a confidential settlement agreement between the parties. Plaintiffs will file on the public record redacted copies of the documents. Pursuant to Local Rule 7.1, Plaintiffs sought and received concurrence in the instant motion from Defendants.

Exhibits A and C to Plaintiffs' Motion for Temporary Restraining Order constitute, respectively, Plaintiffs' Complaint for Permanent Injunctive Relief and Motion for Preliminary Injunction with Jury Demand Endorsed Hereon (Exhibit A), and Plaintiffs' Motion for Leave to

Amend Complaint for Permanent Injunctive Relief and Motion for Preliminary Injunction with Jury Demand (Exhibit C), both filed in the Court of Common Pleas of Franklin County, Pennsylvania.

Plaintiffs request that the documents be sealed because they refer to or include privileged communications.

Accordingly, Plaintiffs respectfully submit this Motion for an Order to seal:

- (1) Exhibits A and C to Plaintiffs' Motion for Temporary Restraining Order (Dkt. Nos. 7-3, 7-5);
- (2) Plaintiffs' Amended Complaint (Dkt. No. 30); and
- (3) Exhibits A-Z to the Amended Complaint (Dkt. No. 30-1).

A proposed Order is attached hereto.

Dated: December 6, 2020

Respectfully submitted,

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Co-Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, David Koller, hereby certify that on December 6, 2020, a true and correct copy of the foregoing was filed with U.S. District Court for the Middle District of Pennsylvania. A copy of the Motion was served via the Court's electronic filing system upon the following:

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Dated: December 6, 2020

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No. 1:20-cv-00067-JPW

(Wilson, J.)

(Mehalchick, M.J.)

ORDER

AND NOW, this ____ day of _____, 2020, upon consideration of Plaintiffs'

Unopposed Motion to Seal Documents, and any response thereto, it is hereby ORDERED and
DECREED that said Motion is GRANTED.

BY THE COURT:

United States District Court Judge